

EXHIBIT F

Lakshmi Ramakrishnan

From: Lakshmi Ramakrishnan
Sent: Friday, November 08, 2013 3:10 PM
To: Todd Prins (taprins@prinslaw.com)
Cc: Amanda Hernandez; Alfonso Kennard
Subject: Magdaleno v. PCM Construction

Dear Todd,

While we remain optimistic that the Magdaleno v. PCM Construction case may settle, we note that the discovery cut-off (pursuant to our agreement to extend the original deadlines) is November 19th. As such, we need to take Miguel Guerra's deposition as soon as possible. I am writing to see whether you and your client would be available for his deposition here in Houston or San Antonio on Tuesday, November 19th. Alternatively, if you would permit the deposition after the discovery cut-off we are available other days in that week.

Please let me know your availability and preferences as soon as possible, and we will issue the deposition notice.

Kind Regards,

Lakshmi Ramakrishnan | Attorney
Main: 713.742.0900 | Fax: 713.742.0951
Lakshmi.Ram@kennardlaw.com



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Amanda Hernandez

From: Todd A. Prins <taprins@prinslaw.com>
Sent: Wednesday, December 04, 2013 3:19 PM
To: Alfonso Kennard; Lakshmi Ramakrishnan
Cc: Patricia Tamez; Amanda Hernandez
Subject: RE: Magdaleno v. PCM Construction

All:

While we will agree to do a deposition in Houston, our pulling of all the files for the additional "opt ins" indicates that 21 of the 28 have arbitration agreements that they signed off on. With that being the case, PCM is requesting us to move forward with filing for arbitration pursuant to those agreements. We need to file a Motion with the Court as was previously done in the Dallas matter.

Thanks,

Todd A. Prins
Prins Law Firm
4940 Broadway, Ste. 108
San Antonio, TX 78209
210-820-0833
210-820-0929 fax
www.prinslaw.com

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From: Alfonso Kennard [mailto:alfonso.kennard@kennardlaw.com]
Sent: Monday, December 02, 2013 11:00 PM
To: Lakshmi Ramakrishnan; Todd A. Prins
Cc: Patricia Tamez; Amanda Hernandez
Subject: RE: Magdaleno v. PCM Construction

Also, please confirm that the deposition will take place in Houston as that is where we intend to notice it. Is there a certain office you would like to use—we are happy to use ours. Forgive me if you have already established this. Thanks.

Alfonso Kennard, Jr. | [Bio](#)
Direct: 713.742.0906 | Fax: 713.742.0951
alfonso.kennard@kennardlaw.com



Cc: Alfonso Kennard; Patricia Tamez; Rhonda Herbert
Subject: RE: Magdaleno v. PCM Construction

I approve.

Thanks,

Todd A. Prins
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From: Amanda Hernandez [<mailto:Amanda.Hernandez@kennardlaw.com>]
Sent: Wednesday, November 27, 2013 12:10 PM
To: Todd A. Prins; Lakshmi Ramakrishnan
Cc: Alfonso Kennard; Patricia Tamez; Rhonda Herbert
Subject: RE: Magdaleno v. PCM Construction

Todd:

Please see the attached Motion to extend. If everything looks fine to you, we will go ahead and file.

Thanks,

Amanda C. Hernandez | Attorney at Law
Main: 713.742.0900 | Fax: 713.742.0951
Amanda.Hernandez@kennardlaw.com



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From: Lakshmi Ramakrishnan
Sent: Monday, December 02, 2013 11:57 AM
To: Todd A. Prins
Cc: Alfonso Kennard; Patricia Tamez; Amanda Hernandez
Subject: RE: Magdaleno v. PCM Construction

Dear Todd,

In light of the Court's Order granting our Motion to Extend Deadlines (see attached), please provide us with dates between December 9- 19 on which we may take your client's deposition.

Kind Regards,

Lakshmi Ramakrishnan | Attorney
Main: 713.742.0900 | Fax: 713.742.0951
Lakshmi.Ram@kennardlaw.com



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From: Todd A. Prins [<mailto:taprins@prinslaw.com>]
Sent: Wednesday, November 27, 2013 2:32 PM
To: Amanda Hernandez; Lakshmi Ramakrishnan

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From: Todd A. Prins [<mailto:taprins@prinslaw.com>]
Sent: Wednesday, November 27, 2013 9:20 AM
To: Lakshmi Ramakrishnan
Cc: Amanda Hernandez; Alfonso Kennard; Patricia Tamez
Subject: RE: Magdaleno v. PCM Construction

I agree to extend the deadlines and will have Trish get some depo dates. Also, I would still like to talk settlement. My clients are trying to put together funding to get something done. It is taking longer than they had hoped, but indicated to me that they want to try to settle.

Thanks,

Todd A. Prins
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San Antonio, TX 78209
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From: Lakshmi Ramakrishnan [<mailto:lakshmi.ram@kennardlaw.com>]
Sent: Tuesday, November 26, 2013 4:26 PM
To: Todd A. Prins
Cc: Amanda Hernandez; Alfonso Kennard; Patricia Tamez
Subject: RE: Magdaleno v. PCM Construction
Importance: High

Dear Todd,

I tried to call you earlier today, but you were unavailable. We are concerned about the deadlines in this case – December 10 (Motions Cut Off) and December 31, 2013 (Joint Pre-trial Order and Motions in Limine Deadline). Docket call is now set for January 9th. As you know we are well past the discovery cut-off but still need to take Mr. Guerra's deposition. We wonder whether it would be prudent to file another Agreed Motion to Extend Deadlines in this case to extend the remaining deadlines by 30 days each. Would you agree to that? Regardless, we still need to know your client's availability for his deposition as soon as possible. If you are not able to provide dates, we may have no choice but to just Notice the deposition for a date next week in your office in San Antonio.

Lastly, I understand that your client did not accept the mediator's proposal to settle this matter, do you think any further settlement conversations would be fruitful?

Kind Regards,

Lakshmi Ramakrishnan | Attorney
Main: 713.742.0900 | Fax: 713.742.0951
Lakshmi.Ram@kennardlaw.com



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From: Todd A. Prins [<mailto:taprins@prinslaw.com>]
Sent: Wednesday, November 20, 2013 5:17 PM
To: Lakshmi Ramakrishnan
Cc: Amanda Hernandez; Alfonso Kennard; Patricia Tamez
Subject: RE: Magdaleno v. PCM Construction

Hi there. I just got back in. He was wanting to meet with me tonight to go over settlement and scheduling his depo, but I've got clients in from out of town prepping for an injunction hearing tomorrow. If we do it in San Antonio, I can be very flexible and have someone present him if I'm not available. Also, I have Ricardo working on supplementing. I know next week is bad for everyone with the holiday, but I'll get dates from him next week and the week of the 2nd.

Thanks,

Todd A. Prins
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From: Lakshmi Ramakrishnan [<mailto:lakshmi.ram@kennardlaw.com>]
Sent: Wednesday, November 20, 2013 5:07 PM
To: Todd A. Prins
Cc: Amanda Hernandez; Alfonso Kennard; Patricia Tamez
Subject: RE: Magdaleno v. PCM Construction
Importance: High

Dear Todd,

Did you have a chance to review my letter from last week? I have attached it again. In particular, could you please address when and where we may be able to take Mr. Guerra's deposition as soon as possible?

Kind Regards,

Lakshmi Ramakrishnan | Attorney
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Lakshmi.Ram@kennardlaw.com



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From: Lakshmi Ramakrishnan
Sent: Friday, November 15, 2013 5:11 PM
To: Todd A. Prins
Cc: Amanda Hernandez; Alfonso Kennard; Patricia Tamez
Subject: RE: Magdaleno v. PCM Construction

Dear Todd,

Attached please find correspondence regarding depositions and discovery in this matter. We look forward to your response.

Kind Regards,

Lakshmi Ramakrishnan | Attorney
Main: 713.742.0900 | Fax: 713.742.0951
Lakshmi.Ram@kennardlaw.com